

1 David P. Matthews
2 TX SBN: 13206200
3 MATTHEWS & ASSOCIATES
4 2905 Sackett St.
5 Houston, TX 77098
6 Tel. (713) 522-5250
7 Fax (713) 535-7184
8 matthewsivc@thematthewslawfirm.com

9
10 Richard Freese
11 AL Bar No. 6879-E67R
12 FREESE & GOSS, PLLC
13 1901 6th Ave N. Ste. 3120
14 Birmingham, AL 35203
15 Tel. (205) 871-4144
16 Fax (205) 871-4104
17 rich@freeseandgoss.com

18
19
20
21
22
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

13 IN RE: Bard IVC Filters Products Liability 14 Litigation	MDL No. 2:15-md-02641-PHX-DGC
15 This document relates to: 16 <i>Aron C. Aldridge v. C.R. Bard, Inc., et al.</i> 17 Member Case No. 2:16-cv-02500-DGC	STIPULATION OF DISMISSAL WITHOUT PREJUDICE

18 TO THE HONORABLE JUDGE OF SAID COURT:

19 COMES NOW, Plaintiff Aron C. Aldridge (“Plaintiff”) and Defendants C.R. Bard, Inc. and
20 Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without
21 Prejudice, and in support thereof, respectfully show the Court as follows:

1 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants
2 hereby stipulate to the dismissal of this case without prejudice to the re-filing of same. Plaintiff
3 and Defendants further stipulate that they are to bear their own costs.

4 WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants hereby respectfully
5 request that the Court dismiss this case in its entirety without prejudice to the re-filing of same
6 and order that these parties are to bear their own costs.

7 Dated this 19th day of November, 2019.

8 Respectfully submitted,

9 /s/ David P. Matthews
David P. Matthews
10 **MATTHEWS & ASSOCIATES**
2905 Sackett St.
Houston, TX 77098

11 Richard A. Freese
12 **FREESE & GOSS, PLLC**
1901 6th Ave. N., Ste. 3120
Birmingham, AL 35203

13 *Attorneys for Plaintiff*

14 /s/ Richard B. North, Jr.
Richard B. North, Jr.
15 Matthew Lerner
16 **Nelson Mullins Riley & Scarborough, LLP**
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
17 Tel. (404) 322-6000
Fax (404) 332-6397

18 *Attorneys for Defendants*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that, this 19th day of November, 2019, I have electronically filed a copy of the
3 above and foregoing with Clerk of the Court using the ECF system, which sent notification of such
4 filing to counsel of record.

5 _____
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

/s/ David P. Matthews